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October 10, 2024

VIA ECF

Hon. Julien Xavier Neals, U.S.D.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *In re: Apple Inc. Smartphone Antitrust Litigation,*
Civil Action No. 2:24-md-03113**

Dear Judge Neals:

I represent plaintiffs in the Direct Purchaser class in the above-referenced matter and am part of the Majority Group's proposed leadership structure. We write in response to the Court's Text Order dated October 9, 2024, directing plaintiffs to outline the organizational and other preliminary issues that can be addressed on November 6, 2024, or another convenient time.

Plaintiffs believe it would be beneficial to discuss the pending motions to appoint lead counsel under Rule 23(g). Resolving this issue will enable the private plaintiffs to begin drafting an amended complaint and initiate early case management activities such as negotiating a Protective Order, ESI Protocol, and Source Code Protocol. Additionally, in response to Your Honor's Text Order this morning, I will advise the Court by October 25 of the number of anticipated attendees at the tutorial. We appreciate the Court's consideration of these issues and look forward to discussing them further on November 6, 2024, or at a subsequent hearing as deemed appropriate by the Court.

Respectfully submitted,

CARELLA BYRNE CECCHI
BRODY & AGNELLO, P.C.

/s/ James E. Cecchi
JAMES E. CECCHI

cc: Hon. Leda Dunn Wettre, U.S.M.J.
Counsel of Record